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"I will stand for my client's rights.  
I am a trial lawyer."  
-Ron Motley (1944-2013)

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July 29, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: *Edwards v. General Motors LLC***  
**Case No.: 15-cv-00481 (S.D.Miss.) (FKB)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

Motley Rice LLC is counsel for the Plaintiff in the above referenced matter. King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC in the above-referenced matter. On July 6, 2015, King & Spalding sent and Motley Rice LLC received correspondence from King & Spalding regarding the Complaint filed in the above-referenced matter, which, among other things, requests that Plaintiff voluntarily dismiss the proceeding within seventeen (17) business days of receipt of the aforementioned letter and its attachments and/or, in the alternative, timely file a No Dismissal Pleading with this Honorable Court. In response, Plaintiff has requested and opposing counsel has agreed, as of July 28, 2015, to extend the time for voluntary dismissal and/or for the filing, in the alternative, of an otherwise responsive pleading by fourteen (14) business days from the date of this submission.

Therefore, we write now to advise the Court of this extension, which has been agreed upon by both parties, and, with the Court's permission, will continue to keep the Court updated as to any further developments in the proceedings related to King & Spalding's correspondence within or before fourteen (14) business days from the date of this filing.

Respectfully submitted,

Kevin Dean

KRD/vt  
Encl.

cc: Scott I. Davidson

